

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**JAMES M. PLASSE**

**Plaintiff,**

**vs.**

**Civil Action No. 04-CV-30056-MAP**

**TYCO ELECTRONICS  
CORPORATION,**

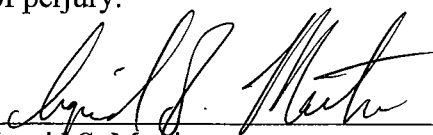
**Defendant.**

**AFFIDAVIT OF INGRID S. MARTIN**

I, Ingrid S. Martin, being duly sworn, state as follows:

1. I am an associate at the law firm of Clements & Clements, LLP.
2. Clements & Clements, LLP represents Tyco Electronics Corporation in the matter of Plasse v. Tyco Electronics Corp., United States District Court for the District of Massachusetts, CA No. 04-CV-30056-MAP.
3. On March 1, 2005, I compared the copy of James M. Plasse's personnel file attached to the Second Affidavit of Maryann Ayala to the copy of the personnel file attached to the original Affidavit of Maryann Ayala. When I compared the two copies of the personnel file, I determined that there were nine additional pages in the copy attached to Maryann Ayala's Second Affidavit. Copies of these nine pages are attached to this affidavit.

Signed under the pains and penalties of perjury.

  
Ingrid S. Martin

July 26, 2000

Tyco Electronics  
11 Tyco Drive  
Stafford Springs, CT 06076

Dear Leslie:

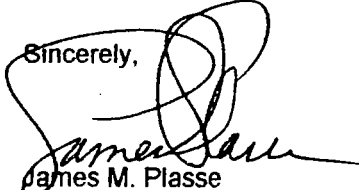
I am enclosing my resume for the position of Controller (Ref Code TPCG Controller/Staff/Man) listed on Monster.com. I have held key financial manager positions for plastic packaging, specialty paper, and sporting goods manufacturing companies. In addition, I have extensive experience overseeing the budgeting process, month end closings, variance analysis, and financial reporting systems in a manufacturing environment.

Tyco, the world's largest supplier of electronic and electrical connectors, with combined sales of over \$22 billion in fiscal 1999 is impressive.

I believe my qualifications closely parallel the requirements for the position and would appreciate meeting with you in person to discuss the position.

Please contact me at 413-562-8708 and I appreciate your confidentiality.

Sincerely,

  
James M. Plasse

*7:40am @ 10:00am - 8/4/00*

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**CONFIDENTIAL RESUME**

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**James M. Plasse**

19 Hillary Lane, Westfield, MA 01085  
Home 413-562-8708, Work 413-529-1333

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**Experience:**

October 1996

**Tubed Products, Inc., Easthampton, MA 01027**

To Present

**Packaging Division of McCormick & Company Spices  
*Financial Analysis Manager***

- Responsible for guiding and supporting senior management in their understanding of the financial related activities in a manner designed to meet the planned profitability of a \$100 million company.
- Provide business advice to members of the operations and sales groups to assist them in achieving profit and volume objectives.
- Contribute to company strategy and initiatives as a key member of the financial staff achieving an \$11 million turnaround in operating profits and a \$5 million reduction in excess and obsolete inventories.
- Responsible for the financial analysis of capital asset proposals to assure conformance with corporate policy and financial targets with the sound investment of a \$7 million capital budget.
- Support the pricing committee by providing the necessary standard and actual costs needed to make sound pricing decisions enabling the company to exceed planned gross margins by 20 percent.
- Coordinated a cross functional team to implement procedures and guidelines to improve the collection and resolution of over \$400 thousand in outstanding receivables.
- Prepare and distribute weekly financial performance results and charts for the weekly staff meeting.
- Work with the company's information systems department to develop financial information systems.
- Responsible for the development and update of the finance departments policies and procedures.
- Chairperson and Executive Committee member of the McCormick & Company Multiple Management Board. (Junior Board of Directors)

June 1992

**Spalding Sports Worldwide, Chicopee, MA 01021**

to October 1996

***Senior Financial Analyst***

- Responsible for the management of accounting staff to ensure an accurate month end close for a \$300 million U.S. Division.
- Interfaced available computer software with financial reporting requirements to streamline manual financial processes.
- Provided financial information for various sales and marketing managers, and vice presidents on key business trends, ratios, and variances.
- Participated in monthly staff meetings to review system improvements, contingency plans, expense reduction plans, and financial results.
- Directly responsible for product line budgets, forecasting, and financial statement analysis.
- Monitored operating expenses, costs, margin analysis, and product line profitability.
- Reconciled domestic and international inventory, manufacturing, and procurement variances.
- Audited billing transactions to assure accuracy and conformance with company policy.
- Reviewed disbursements for all inbound freight, duty, brokerage, bank charges, and custom fees applicable to inventory purchases.

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June 1988                    **Ampad Corporation, Holyoke, MA 01040**  
To June 1992               **Division of Mead Paper & Company**  
                                 ***Senior Cost Accountant***

- Responsible for all functions relating to cost accounting, budgets, and forecasting of a \$200 million company.
- Lead a cross-functional team in the development and implementation of an activity based cost system.
- Coordinated all the manufacturing budgets for six manufacturing plants with \$28 million in inventory.
- Supervised the daily accounting activities of three cost accountants, responsible for the monthly closing process, variance analysis, preparation of monthly financial statements and forecasts.
- Developed computer generated reports for tracking inventory waste, inefficiencies and material usage variances.
- Protected corporate assets through the development and implementation of sound financial policies and procedures.
- Participated in monthly staff meetings with senior management to review financial results, and corporate strategies for operational improvements.

May 1986                    **Sealed Air Corporation, Holyoke, MA 01040**  
To June 1988               ***Plant Controller/Accounting Manager***

- Responsible for all plant accounting activities for two divisions of Sealed Air Corporation.
- Supervised the daily work activities of payroll, accounts payable, and accounts receivable departments.
- Responsible for product line budgets, fixed manufacturing and capital budgets, standard cost development, monthly closings, variance analysis, and monthly financial reporting.
- Prepared monthly profit and loss statements and variance analysis for a process cost environment.
- Assured optimum utilization of financial resources through sound forecasting and cash management.
- Audit billing transactions to assure accuracy and conformance with corporate policy and assist in setting relevant policy.
- Coordinated annual external and internal audits including the annual physical inventory process.

**Relevant Experience**

**and Skills:** Proficient in use of Excel, Microsoft Word and Powerpoint, Lotus 123, Lotus Wordpro, Lotus Freelance, Ross General Ledger, Mapics\XA, and other PC/Network based systems.

**Education:** M.B.A., Western New England College, Springfield, MA  
B.A., Accounting, Westfield State College, Westfield, MA  
A.S., Business Administration, Holyoke Community College, Holyoke, MA  
A.S., Criminal Law, Holyoke Community College, Holyoke, MA

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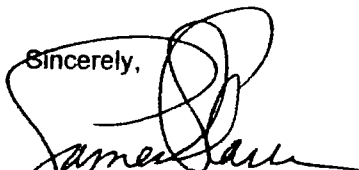
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Sincerely,

  
James M. Plasse

Friday @ 10:00am - 8/4/00  
Tuesday @ 6pm 08/08/00

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Home 413-562-8708, Work 413-529-1333

Fax: 413-529-1291

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 Primary W/Capital  
 + EBIT

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A.S., Criminal Law, Holyoke Community College, Holyoke, MA

**References:** Available upon request

53-7054/2113 2109  
45578606

**JAMES M. PLASSE**  
**DONNA S. PLASSE**  
19 HILLARY LANE  
WESTFIELD, MA 01085

PAY TO THE ORDER OF XXXX \$        DOLLARS

**Banknorth**  
Massachusetts  
300 Main Street  
Worcester, MA 01608

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FRAN AHERN

GULFSTREAM AEROSPACE

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**You have been called for jury duty under the One Day /One Trial system.**

**Roughly 97% of all jurors complete their service within 3 days - many in one day.**

Included in this package are a **TRIAL JUROR'S HANDBOOK** and **"JUROR INSTRUCTIONS AND INFORMATION"** pamphlet which contain answers to the most frequently-asked questions. Please read them both. To learn more you may visit our website at: [www.massjury.com](http://www.massjury.com). A few commonly-asked questions are:

**Q. I'm busy. Why should I serve?**

A. None of us is untouched by or unaware of the issues being dealt with by our local courts every day—abuse of children, drug dealing, drunk driving, etc.—all serious issues that affect our neighborhoods and our families. We must all participate in the process created to resolve these issues.

**Q. I speak English as a second language. Will I understand what's going on in court?**

A. You don't need to speak perfect English. The court uses common, everyday English that everyone can understand. The work done by the courts affects all people and all communities, so people from all communities should be represented.

No one person has to know everything. Jurors deciding the outcome of a trial work as a group with each member making his or her contribution.

**Q. I have children. How can I go?**

A. The fact that you care about your children and the society they are growing up in makes it all the more important for you to serve. Your willingness to be involved gives you a direct impact on issues affecting your community.

Remember, you may reschedule your jury service to any time within 12 months when child care is more easily available. If you're concerned about the length of trials, the court will consider your hardship before you're picked to sit on a jury.

**Q. Why wasn't I assigned to a closer court?**

A. Jurors are randomly summonsed and randomly assigned in order to get a broad cross-section of all residents of the entire county at each court each day. Both the Massachusetts and Federal Constitutions guarantee the right of each and every individual to have his or her dispute resolved by a diverse jury. Local people may know the parties involved in a case, or they may have read about it in their local newspapers and formed an opinion. Your cooperation in reporting to your assigned court helps to insure fair and unbiased trials. However, if you have a hardship you may transfer to another court (see Section D of the **JUROR CONFIRMATION FORM** on the other side of this card).

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